UNITED STATES BANKRUPTCY COURT

WESTERN DISTRICT OF WISCONSIN

In re:

CLAYTON SCOTT ESPIE,

Case No. 23-11784-cjf

Debtor(s).

## MOTION FOR EXTENSION OF TIME TO FILE SCHEDULES AND STATEMENTS (FOR VOLUNTARY CASE)

The above-named Debtor, by his attorneys, Krekeler Law, S.C., hereby moves the Court for an order extending the time period for the Debtor to file schedules and related statements. In support of said Motion, Debtor states as follows:

- 1. The above-named Debtor filed a voluntary petition under Chapter 7 of the Bankruptcy Code on October 9, 2023.
- 2. The time to file the schedules and statements expires October 23, 2023.
- 3. For the following reasons the Debtor is unable to file the schedules and statements required by FRBP 1007 within the prescribed time:
  - a. Debtor is still in the process of reviewing and gathering information required in order to complete his bankruptcy schedules.
  - b. Debtor's counsel wishes to avoid additional costs to the Debtor which would be incurred if incomplete schedules and statements, were filed, as such incomplete schedules and statements would require future amendments.
  - c. The Debtor submits that no interested party will be adversely affected by the extension.

WHEREFORE, movant requests the Court issue an order extending Debtor's time for filing schedules and statements for a period of up to fourteen (14) days, or November 6, 2023.

Dated this 23<sup>rd</sup> day of October, 2023

KREKELER LAW, S.C.

By:

Michaele A Angell State Bar No. 1063924 Attorneys for Debtor, Clayton Scott Espie

## ADDRESS:

26 Schroeder Ct. Suite 300 Madison, WI 53711 (608) 258-8555 UNITED STATES BANKRUPTCY COURT

WESTERN DISTRICT OF WISCONSIN

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## CERTIFICATE OF SERVICE

The undersigned, being first duly sworn on oath, deposes and says that on October 23, 2023, the Debtor's Motion for Extension of Time to File Schedules and Statements and proposed Order was electronically filed with the Clerk of Court and served upon the United States Trustee, the Debtor's attorney, and any other person designated by the Court using the ECF system.

The undersigned, being first duly sworn on oath, deposes and says that on October 23, 2023, the undersigned mailed, properly enclosed in a postpaid envelope, a copy of the Motion for Extension of Time to File Schedules and Statements and proposed Order to:

Clayton S Espie PO Box 14103 Madison, WI 53708

Cheryl Watson